

U.S. ENVIRONMENTAL PROTECTION AGENCY  
POLLUTION/SITUATION REPORT  
Moody Landfill Fire - Removal Polrep



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
Region IV

**Subject:** POLREP #3  
Fire Mitigation Continues  
Moody Landfill Fire  
C4Q6  
Moody, AL  
Latitude: 33.6187920 Longitude: -86.5295290

**To:** James Webster, USEPA R4 ERRPPB  
Grady Springer, ADEM  
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**From:** Terry Stilman, FOSC

**Date:** 1/30/2023

**Reporting Period:** 1/23/23 - 1/29/23

## 1. Introduction

### 1.1 Background

<b>Site Number:</b>	C4Q6	<b>Contract Number:</b>	
<b>D.O. Number:</b>		<b>Action Memo Date:</b>	1/23/2023
<b>Response Authority:</b>	CERCLA	<b>Response Type:</b>	Emergency
<b>Response Lead:</b>	EPA	<b>Incident Category:</b>	Removal Action
<b>NPL Status:</b>	Non NPL	<b>Operable Unit:</b>	
<b>Mobilization Date:</b>	1/18/2023	<b>Start Date:</b>	1/18/2023
<b>Demob Date:</b>		<b>Completion Date:</b>	
<b>CERCLIS ID:</b>	ALN000420955	<b>RCRIS ID:</b>	
<b>ERNS No.:</b>		<b>State Notification:</b>	
<b>FPN#:</b>		<b>Reimbursable Account #:</b>	

#### 1.1.1 Incident Category

Emergency Response to a Landfill Fire

#### 1.1.2 Site Description

The Alabama Department of Environmental Management (ADEM) considers the Site as a disposal area for vegetative debris (aka "green waste") with several piles of material in various states of management. The U.S. Environmental Protection Agency (EPA) and ADEM have documented the presence of construction debris within the landfill and as indicated by signs at the Site, the landfill also accepted asphalt waste. The Site was not constructed with a landfill liner or drainage controls. Layers of cover material have not consistently been installed as part of the Site operations and maintenance practices.

##### 1.1.2.1 Location

The Site is surrounded by residential homes in all directions; a forest is located to the east. The Site drains north to an unnamed tributary and then 2,500 feet east to Big Black Creek.

##### 1.1.2.2 Description of Threat

On January 4, 2023, ADEM requested assistance from the EPA to conduct air monitoring and air sampling at the Site. The fire at Moody Landfill has been burning since late November 2022. Residents near the fire have filed multiple complaints with the State and St. Clair County as well as with the National Response Center (NRC) regarding the smoke and potential health hazards.

#### 1.1.3 Preliminary Removal Assessment/Removal Site Inspection Results

On January 6, 2023, the EPA mobilized to the Site with equipment and personnel to conduct air monitoring and collect air samples at four stations in and around the Site. Two stations were located on the landfill property, and two were established in residential lots less than 200 yards downwind of the Site.

Sampling and monitoring activities were completed on January 7, 2023, and the EPA demobilized from the Site to await analytical results. Air samples were sent off-site for laboratory analysis. Results of analysis of the air samples indicated that four VOCs (1,3-Butadiene, Acetonitrile, Benzene and Trichloroethene) exceeded their respective EPA residential Removal Management Levels (RMLs) at the onsite sampling stations. Two VOCs (1,3-Butadiene and Benzene) exceeded their respective RMLs at a sampling station on a residential lot.

ADEM and St. Clair County have inspected the Site, conducted air monitoring, and implemented public outreach efforts. Local firefighting resources have responded with attempts to extinguish the fire that have been unsuccessful. In November of 2022, Alabama Forestry Commission cut a fire break around the perimeter of the Site to reduce the risk of ignition in adjacent parcels. Representatives from State and Local agencies have attempted to work with the owner and operator of the landfill facility to compel firefighting efforts that have not been successful. St. Clair County and the State of Alabama declared states of emergency on January 3 and 18, 2023, respectively. On January 17, 2023, ADEM and St. Clair County requested EPA assistance to address the continued off-site migration of hazardous substances.

On January 18, 2023, the EPA Federal On-Scene Coordinator (FOSC) determined that an emergency response removal action was warranted based on these sample results. On January 23, 2023, the EPA Region 4, Superfund and Emergency Management Division Director authorized continued response actions.

## 2. Current Activities

### 2.1 Operations Section

#### 2.1.1 Narrative

The EPA has mobilized its Emergency Rapid Response Services (ERRS) contractor, Superfund Technical Assessment and Response Team (START) contractor and the EPA Environmental Response Team (ERT). With assistance from ADEM and St. Clair County, the EPA has identified a source that can be used as cover material to conduct assist with fire mitigation activities.

Four air monitoring / air sampling stations have been deployed in the community around the Site. Air monitoring units are operating 24 hours per day and transmitting data remotely to EPA's "VIPER" database. Sensors include a DustTrak for particulate monitoring and MultiRAE Pro for gas monitoring. Data summary reports are being produced each day for a timeframe covering 6:00am on the previous day to 6:00am on the current day. Air samples are being collected at each station daily for Volatile Organic Compounds (VOCs) and Poly-Aromatic Hydrocarbons (PAHs).

Initial efforts of firefighting with heavy equipment includes re-grading the Site and spraying with water for emissions control. Local dirt/fill is used to encapsulate the landfill to reduce air infiltration; the lack of oxygen will eventually smother (i.e. suffocate) the fire.

#### 2.1.2 Response Actions to Date

JANUARY 23 - 29, 2023:

- ERRS continues grading the Site, from southeast to northwest.
- Soil from the borrow pit continues to arrive, 546 loads were delivered to the Site to date (approximately 12 cubic yards per load).
- On-site soils are also used as cover materials.
- Gravel is used for stabilizing some roads on the Site.
- ERT and START continuing to monitor four air monitoring stations surrounding the Site.
- ERT and START assisting with worker safety monitoring on-site.
- A water truck is used on-site to assist with emissions control.
- START collecting VOC and PAH samples during the day.
- START conducting periodic roving air monitoring around the landfill for benzene and particulates.
- An unmanned aircraft was flown over the site to collect photographs and LiDAR data, these will be processed into a digital model and aerial map of the Site.

#### 2.1.3 Enforcement Activities, Identity of Potentially Responsible Parties (PRPs)

EPA will continue to identify PRPs for the Site.

#### 2.1.4 Progress Metrics

- Approximately 6,552 cubic yards of cover material have been received from the local borrow pit

<i>Waste Stream</i>	<i>Medium</i>	<i>Quantity</i>	<i>Manifest #</i>	<i>Treatment</i>	<i>Disposal</i>

## 2.2 Planning Section

### 2.2.1 Anticipated Activities

#### 2.2.1.1 Planned Response Activities

- Prepare and implement a health and safety plan;
- Conduct fire mitigation operations and debris stockpile management in order to reduce the risk of reignition;
- Mitigate off-site impacts due to firefighting operations to the extent practicable;
- Conduct and maintain air quality monitoring and air sampling; and,
- Prepare and implement an outreach plan to notify the community of response activities and air quality conditions.

#### 2.2.1.2 Next Steps

- Fire mitigation activities will continue with additional grading and compaction

### 2.2.2 Issues

Off-site air monitors have reported significant reductions of PM<sub>2.5</sub>, with periodic spikes depending on weather and on-going fire mitigation.

On-site work continues with breathing protection due to elevated levels of PM 2.5 and Carbon Monoxide:

1. All equipment operators on the landfill are supplied with breathing air
2. Personnel in the staging area on the landfill will either be on breathing air or wearing a respirator and carrying, or working near, a CO monitor
3. Time on the landfill is limited to the performance of specific tasks or duties

## 2.3 Logistics Section

ERRS working with the borrow pit operator to ensure availability of haul trucks.

## 2.4 Finance Section

### 2.4.1 Narrative

An Additional Funding Request and Change in Scope Action Memorandum has been signed with a ceiling of \$1,529,316.

#### Estimated Costs \*

	Budgeted	Total To Date	Remaining	% Remaining
<b>Extramural Costs</b>				
ERRS - Cleanup Contractor	\$1,000,000.00	\$280,000.00	\$720,000.00	72.00%
TAT/START	\$100,000.00	\$65,000.00	\$35,000.00	35.00%
EPA RRC	\$20,000.00	\$10,000.00	\$10,000.00	50.00%
REAC	\$80,000.00	\$38,000.00	\$42,000.00	52.50%
<b>Intramural Costs</b>				
<b>Total Site Costs</b>	\$1,200,000.00	\$393,000.00	\$807,000.00	67.25%

\* The above accounting of expenditures is an estimate based on figures known to the OSC at the time this report was written. The OSC does not necessarily receive specific figures on final payments made to any contractor(s). Other financial data which the OSC must rely upon may not be entirely up-to-date. The cost accounting provided in this report does not necessarily represent an exact monetary figure which the government may include in any claim for cost recovery.

## 2.5 Other Command Staff

### 2.5.1 Safety Officer

EPA ERT is assisting with Site Safety and provided the FOSC with critical information about measurements of CO in the operational area.

### 2.5.2 Community Liaison Officer

EPA has identified a Community Involvement Coordinator for the Site and contact information has been listed on the public page for the Site at [response.epa.gov](https://response.epa.gov).

### 2.5.3 Information Officer

EPA has identified a Public Information Officer for the Site contact information has been listed on the public page for the Site at [response.epa.gov](https://response.epa.gov).

## 3. Participating Entities

### Unified Command

EPA  
ADEM  
St. Claire County

## 4. Personnel On Site

EPA Region 4 - 1  
EPA ERT - 1  
EPA ERT REAC - 1  
EPA START - 2  
EPA ERRS - 12  
ADEM - 1  
St. Claire County - 1

## 5. Definition of Terms

ADEM - Alabama Department of Environmental Management  
CO - Carbon Monoxide  
EPA - Environmental Protection Agency  
ERRS - EPA's Emergency Rapid Response Services contractor  
ERT - EPA's Environmental Response Team  
FOSC - Federal On-Scene Coordinator (same as OSC)  
OSC - On-Scene Coordinator (same as FOSC)  
PAH - Poly-Aromatic Hydrocarbon  
PM2.5 - Particulate matter smaller than 2.5 microns  
PRP - Potentially Responsible Party  
START - EPA's Superfund Technical Assessment and Response Team contractor  
VIPER - EPA's response monitoring database (not an acronym)  
VOC - Volatile Organic Compound

## 6. Additional sources of information

Information is being released to the public through the Site webpage at [response.epa.gov/MoodyLandfillFire](https://response.epa.gov/MoodyLandfillFire)

## 7. Situational Reference Materials

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